

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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SCREEN ACTORS GUILD - AMERICAN	:	
FEDERATION OF TELEVISION AND RADIO	:	
ARTISTS, NEW YORK LOCAL	:	
	:	
Plaintiff,	:	Civil No. 21/4972
	:	
-v-	:	
	:	
NEW YORK PUBLIC RADIO	:	
	:	
Defendant.	:	
-----X	:	

EXHIBIT F TO COMPLAINT TO COMPEL ARBITRATION



Date: May 18, 2021		
Name of Filing Party: Screen Actors Guild - American Federation of Television and Radio Artists (SAG-AFTRA)		
Check applicable box: Filing Party is <input checked="" type="checkbox"/> Union or <input type="checkbox"/> Employer		
Address: 1900 Broadway, 5th Floor		
City: New York	State: New York <input checked="" type="checkbox"/>	Zip Code: 10023
Telephone: 2128634292	Fax No.:	
Cell Phone:		
Email Address: Joshua.Mendelsohn@sagaftra.org		
Name of Filing Party's Representative:		
Name of Firm (if applicable):		
Representative's Address:		
City:	State: Select...	Zip Code:
Telephone:	Fax No.:	
Cell Phone:		
Email Address:		
Additional Email(s) to be Copied on Correspondence: Becky.Hayes@sagaftra.org, Richard.Larkin@sagaftra.org		
AAA Should Communicate With Me By: <input checked="" type="checkbox"/> Email <input type="checkbox"/> Fax <input type="checkbox"/> Mail		
The filing party, a party to a Collective Bargaining Agreement dated July 1, 2018, which provides for arbitration under the Labor Arbitration Rules of the American Arbitration Association, hereby demands arbitration.		
Nature of Grievance: <input checked="" type="checkbox"/> Discharge <input type="checkbox"/> Suspension <input type="checkbox"/> Other Discipline <input checked="" type="checkbox"/> Contract Interpretation <input type="checkbox"/> Other Describe: Termination of Fred Mogul, Failure to pay Severance, abrogation and refusal to abide by grievance process.		
Requested: <input checked="" type="checkbox"/> Full Administration <input type="checkbox"/> List with Appointment <input type="checkbox"/> List Only		
Remedy Sought: Reinstatement of Mogul and Back Pay plus interest or in the alternative full severance payments plus interest. Affirmative order obligating WNYC to comply with grievance process. Any and all other remedial payments or orders.		



Name of Grievant(s) (if applicable): Fred Mogul		
The filing party requests that hearings be held at the following location: New York, NY		
You are hereby notified that copies of our arbitration agreement and this demand are being filed with the American Arbitration Association office located in New York, NY, with a request that it commence administration of the arbitration. Under the rules, you may file an answering statement within ten (10) days after notice from the AAA.		
Name of Respondent: New York Public Radio Check applicable box: Respondent is <input type="checkbox"/> Union or <input checked="" type="checkbox"/> Employer		
Contact Person: Monique Jefferson		
Address: 160 Varick Street		
City: New York	State: New York <input type="checkbox"/>	Zip Code: 10023
Telephone: 646-829-4102	Fax No.:	
Email Address: MJefferson@nypublicradio.org		
Name of Respondent's Representative (if known): Edward Lieber		
Name of Firm (if applicable): Kauff, McGuire & Margolis, LLP		
Representative's Address: 950 Third Avenue 14th Floor, New York, NY 10022		
City: New York	State: New York <input type="checkbox"/>	Zip Code: 10022
Telephone: 212.909.0720	Fax No.:	
Email Address: Lieber@Kmm.com		
AAA Customer Service can be reached at 800-778-7879.		
Reminders: Send a copy of this form to the other side at the time it is forwarded to the AAA. Please reference appropriate fees pursuant to the fee schedule outlined in the Labor Rules. You can file your case online by visiting the AAA's website at www.adr.org . Please select "AAA Webfile" from the list of side menu options. <i>You may also wish to visit our website for a complete list of our administrative services and procedures, including our Grievance Mediation Procedures, Expedited Procedures, List Only Service and List with Appointment. Your case manager can also provide additional information.</i>		